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*Attorneys for Plaintiffs The Spearmint Rhino
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

The Spearmint Rhino Companies Worldwide,
Inc. and K-Kel, Inc.,

Plaintiffs,

vs.

Chang's Dynasty LLC and Alan Chang,

Defendants.

Civil Action No. 2:23-cv-02040-ART-BNW

Honorable Anne R. Traum
Magistrate Judge Brenda Weksler

**JOINT STATUS REPORT REGARDING
STATUS OF SETTLEMENT
DISCUSSIONS AND PROPOSED CASE
SCHEDULE**

End of stay: June 2, 2025

1 Plaintiffs The Spearmint Rhino Companies Worldwide, Inc. and K-Kel, Inc.
 2 (“Plaintiffs”) and Defendants Chang’s Dynasty LLC and Alan Chang (“Defendants”)
 3 (collectively, “the Parties”) hereby respectfully and jointly provide this status report to the
 4 Court regarding the status of the parties’ settlement discussions pursuant to the Court’s orders
 5 granting the Parties’ request for a stay, and further extension of same. (Dkt. 43; 46.)

6 At this time, the Parties have not reached a final settlement. Accordingly, the Parties
 7 request that the Court lift the stay in this matter, and enter an order adopting the following
 8 proposed, stipulated case schedule:

Event	Deadline
Opening Expert Reports	Aug 29, 2025
Rebuttal Expert Reports	Sept 26, 2025
Close of Expert Discovery	Oct 10, 2025
Dispositive Motions	Oct 31, 2025
Pretrial Order	Nov 21, 2025

14 Further, the Parties shall meet and confer in an effort to resolve any outstanding fact
 15 discovery issues raised before the commencement of the stay and shall complete such
 16 discovery no later than August 1, 2025, except as otherwise ordered by the Court.

17 Good cause exists to grant this request as the Parties do not wish to further delay the
 18 resolution of this dispute.

20 Dated: June 4, 2025

STRADLING YOCCA CARLSON & RAUTH LLP

21 By: /s/ Douglas Q. Hahn

Douglas Q. Hahn

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25 *Attorneys for Plaintiffs The Spearmint Rhino*
 26 *Companies Worldwide, Inc. and K-Kel, Inc.*

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MAXWELL GOSS PLLC

By: /s/ Maxwell Goss
Maxwell Goss

RANDAZZA LEGAL GROUP

Marc J. Randazza
Ronald D. Green

*Attorneys for Defendants
Chang's Dynasty LLC and Alan Chang*

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: June 6, 2025

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that a true and correct copy of the document is being served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Douglas Q. Hahn